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Our File No. 339583-000245

**By electronic filing**

October 5, 2017

Kirsten Walli  
Board Secretary  
Ontario Energy Board  
2300 Yonge Street  
27<sup>th</sup> floor  
Toronto, ON M4P 1E4

Dear Ms. Walli

**Re: Independent Electricity System Operator ("IESO")  
Application for Approval of 2017 Revenue Requirement,  
Expenditures and Fees  
Board File No.: EB-2017-0150**

We are solicitors for Canadian Manufacturers and Exporters in the above referenced proceeding. As described in the settlement proposal filed by the IESO on October 3, 2017, all parties to these proceedings have either agreed to, or take no position on, all issues with the exception of Unsettled Issues 4.4 and 5. 1 which are, respectively:

1. Should the IESO establish a separate Market Renewal Program Deferral Account?
2. Is the IESO's proposed Regulatory Scorecard appropriate?

We submit that an oral hearing is the most efficient way of determining both of these issues.

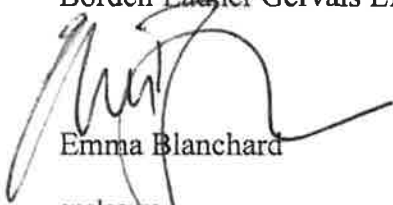
The first issue relates to the amount of external oversight and scrutiny which will be applied to the delivery of the Market Renewal Program, which is the most significant project to be undertaken by the IESO in recent memory. Cross examination is required to test the proposition that tracking the costs of staff and external resources dedicated to the Market Renewal Program against planned costs and resources as proposed by the IESO will provide a sufficient degree of transparency and accountability.

The second issue relates to the scope and contents of the IESO's proposed Regulatory Scorecard. Questions about which metrics can reasonably be expected to be produced by the IESO as well as their value to ratepayers and to the Board in assessing the IESO's performance are of central importance and require a robust record in order to be fairly determined. An oral hearing would provide for a more complete record with respect to some of the metrics in issue as between the parties.

Given the above we submit that an oral hearing should be scheduled in this matter.

Yours very truly

Borden Ladner Gervais LLP



Emma Blanchard

enclosure

c. EB-2017-0150 Intervenors  
Paul Clipsham (CME)

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